

2433 South Grand Avenue  
Los Angeles, CA 90007  
tel 213.763.2520 Ext. 227  
fax 213.763.2729  
www.fibr.com

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President's Council on Food Safety  
C/o USDA/FSIS Hearing Clerk  
300 12<sup>th</sup> Street, S.W.  
Room 102 Cotton Annex  
Washington, D.C. 20250-3700  
Docket Number: 98-045N

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SECRETARY

Dear Council Members:

Thank you for the opportunity to provide comments on the Food Safety Strategic Plan that is being developed as part of the President's Initiative on Food Safety.

The Food Industry Business Roundtable (FIBR) is a non-profit trade association created to promote and sustain the growth and viability of the ethnic-specialty food processing industry in the Southern California region. We believe that by sharing information, knowledge and resources, we can build partnerships and relationships that will benefit the entire food processing industry. FIBR has nearly sixty association members and reaches an audience of over 700 Southern California food processors through our business seminars, mixers and association newsletter. The majority of FIBR's members are small-to medium-sized food processors, while other members include suppliers, retail, local and state regulators, and academia.

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J. Mark Roth  
EL BURRITO MEXICAN FOOD PRODUCTS, INC

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JUANITA'S FOODS

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Kenny Yee  
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TOP NOTCH FOODS, INC.

Fred Francia  
SOUTHERN CALIFORNIA EDISON/ADVISOR

Linda Yeung  
CO-FOUNDER/ADVISOR

In FIBR's three young years, we have worked hard to provide information that not only helps businesses stay competitive, but also works to ensure safe, quality products in our region. To that end, FIBR is very interested in providing constructive input as the Council finalizes its strategic plan.

Although FIBR does not have the staff or resources to provide in-depth analysis of the proposed plan, there are some basic themes we think are critical to successful implementation:

**Education and Training:** Industry has a great interest in providing safe, quality products -- it just makes good business sense. Unsafe food product put the company's reputation, customers and sales at stake. For small and medium-sized food processors, resources for educating and training their workforce can be an issue. A well informed workforce, educated in general food safety, good manufacturing practices and HACCP (where applicable) can help ensure safe food products for consumers. Resources allocated to provide or at least supplement training costs will help industry provide the safest environment possible.

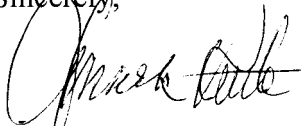
**Science and Risk-based Assessment:** Industry understands that inspection and enforcement are necessary. However in-plant inspections and testing are labor-intensive and costly to business and government. Science and risk-based assessments are a good idea as long as they are based on factual statistics that are well proven and accurate. Such methods will help to streamline inspections and enforcement of industry by prioritizing real or potential hazards and directing the scarce resources of state and local officials where they are needed most.

**Unified, Standardized Policies:** Recognizing that all health agencies, local, state and federal have an important role to play in food safety, FIBR supports a unified food safety policy that would standardize methods of assessment, inspection and enforcement. Industry is challenged when working to comply with a multitude of regulators, whom each have their own unique systems and approaches to food safety. Although we recognize complete standardization among such a diverse group of agencies would not be easy, some basic overarching policies regarding methods of assessment, inspection and enforcement would make the job of compliance an easier one for industry to achieve.


**Final Recommendation:** FIBR would like recommend that the Council take necessary action to ensure that the hard work expended in this process by government, industry, academia and consumers will not be lost with a change in administrations. With elections just a heart-beat away, a mechanism should be put in place that ensures that the work of the Council will continue past the planning stages and that successful implementation will take place.

The Food Industry Business Roundtable thanks you for the opportunity to comment on the Food Safety Strategic Plan being developed by the Council. Although FIBR has little in resources to offer to this process, we do have the knowledge and expertise of our members and we look forward to continuing to participate in this process.

Sincerely,



J. Mark Roth  
President  
El Burrito Mexican Food Products  
FIBR President



Henry Leong  
President  
Quon Yick Noodle Company  
FIBR Legislative Committee Chair